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Attorneys for Plaintiffs  
**HIDDEN EMPIRE HOLDINGS, LLC;  
HYPER ENGINE, LLC; AND DEON  
TAYLOR; AND THIRD-PARTY  
DEFENDANT ROXANNE TAYLOR**

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## UNITED STATES DISTRICT COURT

### FOR THE CENTRAL DISTRICT OF CALIFORNIA

HIDDEN EMPIRE HOLDINGS,  
LLC; a Delaware limited liability  
company; HYPER ENGINE, LLC; a  
California limited liability company;  
DEON TAYLOR, an individual,

Plaintiffs,

vs.

DARRICK ANGELONE, an  
individual; AONE CREATIVE LLC,  
formerly known as AONEE  
ENTERTAINMENT LLC, a Florida  
limited liability company; and ON  
CHAIN INNOVATIONS LLC, a  
Florida limited liability company,

Defendants.

**CASE NO.: 2:22-cv-06515-MWF-AGR**  
(Hon. Michael W. Fitzgerald, Dept. 5A)

### JOINT EXHIBIT LIST

Complaint Filed: September 12, 2022  
Trial Date: January 13, 2026

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1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Exhibit No.	Description	Date Identified	Date Admitted
1.	2012 Agreement HEFGLLC and AOne			
2.	12/03/12 email between V. Sykes and D. Angelone			
3.	12/10/14 email between R. Taylor and D. Angelone			
4.	12/10/14 email between D. Angelone and R. Taylor			
5.	10/13/15 email between GoDaddy.com and R. Taylor			
6.	10/13/15 email between R. Taylor and D. Angelone			
7.	05/08/18 email between D. Angelone and R. Taylor			
8.	07/06/18 email between R. Taylor and D. Angelone			
9.	Invoices for domain renewal fees			
10.	07/19/18 email between R. Taylor and D. Angelone			
11.	04/22/2022 email between R. Taylor and D. Angelone			
12.	12/14 email between R. Taylor and D. Angelone			



1	13.	10/22/15 email between R. Taylor and D. Angelone		
2	14.	09/06/22 HEFG Instagram and Twitter posts		
3	15.	Excerpt from marketing dec for “Fear” film.		
4	16.	Screenshots of the characters from the Fear.game website		
5	17.	Longview News Journal article regarding Fear game		
6	18.	Printout from D. Angelone’s Instagram page		
7	19.	09/20/19 email exchange involving D. Angelone		
8	20.	08/11/22 email between R. Taylor, JT Fox and D. Thompson		
9	21.	08/22/22 text messages between D. Angelone and R. Taylor		
10	22.	Emails between R. Taylor and HEFG’s accountants		
11	23.	8/22/22 text messages between R. Taylor and D. Angelone		
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1	24.	08/22 email from D. Thompson		
2	25.	08/11/22 email between D. Taylor, JT Fox and D. Thompson		
3	26.	Google Return No. 25783578		
4		10/27/22 Correspondence between Google and R. Taylor		
5	27.	11/01/22 correspondence between Google and R. Taylor		
6	28.	11/08/22 correspondence between Google and R. Taylor		
7	29.	September 28, 2022 D. Angelone declaration		
8	30.	Admin console and Google audit logs		
9	31.	Documents produced by Charter Communications		
10	32.	Documents produced by Twitter		
11	33.	10/05/22 correspondence between D. Angelone and E. Burke		
12	34.	10/07/22 email correspondence between D.		
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1	Angelone and E. Burke		
2	35. 10/11/22 email correspondence between D. Angelone and E. Burke		
3	36. 10/13/22 email correspondence between E. Burke and D. Angelone		
4	37. 08/06/21 email between D. Angelone and Q. Newell		
5	38. 08/02/22 email from R. Taylor to D. Angelone		
6	39. 08/03/22 email from D. Angelone to R. Taylor		
7	40. 08/03/22 email from D. Taylor to D. Angelone		
8	41. 08/03/22 email from D. Angelone to D. Taylor		
9	42. 08/04/22 email from D. Taylor to D. Angelone		
10	43. 08/04/22 email from D. Thompson to Q. Newell		
11	44. 08/04/22 email from Q. Newell to D. Thompson		
12	45. 08/04/22 email from Q. Newell to D. Thompson		
13	46. 08/08/22 email from Q. Newell to D. Thompson		
14	47. 08/09/22 email from D. Taylor to D. Angelone		
15	48. 08/09/22 email from D. Angelone to D. Taylor		
16	49. 08/09/22 email from Q. Newell to D. Angelone		



1	50.	08/09/22 email from Q. Newell to D. Angelone		
2	51.	08/9/22 email from D. Angelone to Q. Newell		
3	52.	08/09/22 emails between Q. Newell and D. Angelone		
4	53.	08/16/22 email from Google to HEFG		
5	54.	Detailed Record View U.S. Copyright Office Public Records System		
6	55.	08/11/22 email from D. Taylor to D. Angelone		
7	56.	08/22/23 article by Jacky Jasper: "Deon Taylor Exposed: The 'Fake Friend' in Jamie Foxx's Scandalous Post"		
8	57.	YouTube video – Director Deon Taylor Chimes in on Jada Smith's Toxicity & Will Smith and Chris Rock's Masculinity		
9	58	Hyper Engine, LLC Articles of Incorporation		
10	59	FTI Invoices		
11	60	Erin Burke Invoices		
12	61	Namecheap Production		
13	62	Documents produced by Google		
14	63	Operating Agreement of Social Distance LLC		
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1	64.	Judgment by Default By Court in Berman v. Comeau et al, LASC Case No. BC509496		
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5 **DEFENDANT'S EXHIBITS**  
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7 EX No.	8 DESCRIPTION	9 IDENTIFIED	10 ADMITTED
11	12 <b>100.</b> 6/29/2009 Whaley v. 13 Hooks/Deon Taylor case 14 filings alleging breach of 15 fiduciary duty and fraud in 16 an investor/partner dispute.	17	18
19	20 <b>101.</b> 8/13/2010 Phifer v. Deon 21 Taylor/DTE/HEFG 22 pleadings alleging breach of 23 contract, fraud, conversion, 24 and trademark/intellectual 25 property claims.	26	27
28	29 <b>102.</b> 5/13/2011 Potter v. Deon 30 Taylor/DTE/NBF cross- 31 complaint and related 32 agreements concerning 33 consulting/employment and 34 alleged contract breaches.	35	36
37	38 <b>103.</b> 6/10/2011 Rapton v. Deon 39 Taylor entities complaint and 40 abstract of judgment	41	42

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1	involving claims for fraud		
2	and contract damages in		
3	excess of \$200,000.		
4	<b>104.</b> 6/24/2011 Vail v. Vista		
5	Taylor complaint alleging		
6	fraudulent-transfer and		
7	conspiracy claims relating to		
8	alleged asset transfers.		
9			
10	<b>105.</b> 9/20/2011 email regarding		
11	initial LMAO web platform		
12	terms, including discussion		
13	of equity share and platform		
14	terms.		
15	<b>106.</b> 12/1/2011 NSLC v. Deon		
16	and Roxanne Taylor		
17	complaint and judgment		
18	relating to a commercial		
19	lease dispute with personal		
20	guarantees and monetary		
21	judgment.		
22	<b>107.</b> 4/26/2012 signed AOne–		
23	HEFG LMAO/website		
24	development agreement and		
25	addendum describing scope		
26	of work, deliverables, and		
27	budget.		
28	<b>108.</b> 7/9/2012 email from Velma		



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1	Taylor's signature.		
2	<b>114.</b> 8/20/2012 email from Deon Taylor discussing completion and close-out of website work performed by AOne.		
3	<b>115.</b> 9/1/2012 LMAO Allstar Comedy Series business plan and 24-month budgets provided to AOne.		
4	<b>116.</b> 12/3/2012 email chain in which Darrick Angelone requests server access with Velma and Deon copied regarding website administration.		
5	<b>117.</b> 12/3/2012 email from Velma providing access credentials at Deon Taylor's direction.		
6	<b>118.</b> 3/19/2013 AOne invoice in the amount of \$10,000 for the final website balance.		
7	<b>119.</b> 3/19/2013 email from Roxanne Taylor directing that the HEFG website be taken offline.		
8	<b>120.</b> 3/19/2013 email from		

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1	Darrick Angelone offering 2 website training and 3 assistance in transitioning 4 control.		
5	<b>121.</b> 3/26/2013 email from 6 Darrick Angelone 7 confirming that the HEFG 8 website is offline and that 9 backend access is available 10 through AOne.		
11	<b>122.</b> 5/20/2013 AOne invoice in 12 the amount of \$12,500 for 13 HEFG/LMAO website work.		
14	<b>123.</b> 6/12/2013 email from Deon 15 Taylor to Darrick Angelone 16 discussing a proposed equity 17 interest for Angelone in the 18 LMAO project.		
19	<b>124.</b> 8/21/2013 email from Deon 20 Taylor to Darrick Angelone 21 regarding potential new 22 projects and continued 23 collaboration.		
24	<b>125.</b> 9/24/2013 2Smart 25 Entertainment v. 26 HEFG/Deon 27 Taylor/Roxanne Taylor		
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1	complaint asserting contract and misrepresentation- related claims in excess of \$200,000.		
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5	<b>126.</b> 9/30/2013 email from Roxanne Taylor requesting FTP assistance for HEFG website access.		
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10	<b>127.</b> 10/1/2013 email from Darrick Angelone transmitting FTP credentials and instructions for HEFG website access.		
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15	<b>128.</b> 10/1/2013 email from Darrick Angelone stating that he does not manage or have access to HEFG's domain registrar or email server.		
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21	<b>129.</b> 10/1/2013 email from Roxanne Taylor acknowledging that the hiddenempirefilmgroup.com domain expired.		
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26	<b>130.</b> 10/22/2013 email from Deon Taylor to Roxanne Taylor instructing that online work		
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1	with AOne be closed out.		
2	<b>131.</b> 10/27/2013 email from Darrick Angelone describing that a three-month website contract extended to approximately 19 months and addressing project delays.		
3	<b>132.</b> 10/27/2013 email from Deon Taylor acknowledging past-due payments and commenting on Darrick Angelone's work.		
4	<b>133.</b> 11/18/2013 email from Roxanne Taylor requesting a meeting to discuss website updates.		
5	<b>134.</b> 12/4/2013 email from Roxanne Taylor explaining that email issues caused delay in sending requested website changes.		
6	<b>135.</b> 11/12/2014 Okoro v. Deon Taylor/HEFG complaint, memorandum of understanding, and related emails concerning alleged		
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1	investor-related claims		
2	including fraud, conversion,		
3	and nonpayment.		
4	<b>136.</b> 12/10/2014 email from		
5	Darrick Angelone explaining		
6	that the HEFG website is		
7	hosted on HEFG servers and		
8	that AOne has design files		
9	and a May 2014 database		
10	backup.		
11	<b>137.</b> 12/10/2014 email from		
12	Roxanne Taylor stating that		
13	she allowed the HEFG		
14	domain to expire and that it		
15	was subsequently acquired		
16	by another party.		
17	<b>138.</b> 12/10/2014 email from		
18	Roxanne Taylor requesting		
19	from Darrick Angelone the		
20	website file needed to restore		
21	the site.		
22	<b>139.</b> 12/11/2014 email confirming		
23	that AOne registered the		
24	hiddenempirefilms.com		
25	domain for HEFG.		
26	<b>140.</b> 12/22/2014 email from		
27	Darrick Angelone providing		
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	full cPanel and email credentials and setup instructions for hiddenempirefilms.com.		
<b>141.</b>	2/3/2015 email thread regarding device configuration for HEFG email accounts and related IT support.		
<b>142.</b>	2/9/2015 email regarding configuration and setup of Velma's HEFG email account.		
<b>143.</b>	8/20/2015 email from Darrick Angelone to Roxanne Taylor explaining email server management and cPanel functions.		
<b>144.</b>	8/20/2015 email from Roxanne Taylor requesting access to Deon Taylor's emails in order to send messages on his behalf.		
<b>145.</b>	9/1/2015 email from Roxanne Taylor seeking assistance from Darrick Angelone in accessing		

	HEFG email accounts, with cPanel instructions.		
146.	10/13/2015 Namecheap order showing registration by AOne of hiddenempirefilmgroup.com and meettheblacksthemovie.com domains.		
147.	11/20/2015 email from Deon Taylor expressing interest in a Meet the Blacks mobile game concept proposed by AOne.		
148.	12/29/2015 email chain describing HEFG email and server access, cPanel settings, ports, and troubleshooting steps.		
149.	12/29/2015 emails from Roxanne Taylor requesting password reset for an email account due to a forgotten password.		
150.	1/27/2016 email setting out Meet the Blacks deal memo terms between HEFG and		



1	2	AOne relating to the film marketing campaign.		
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28	151.	3/28/2016 complaint in Richmond v. Deon Taylor, Roxanne Taylor, and DTE regarding a \$1.2 million promissory note and related claims for fraud and conversion.		
152.	8/21/2016 email regarding HEFG business status and potential marketing- company partnership discussions involving Angelone and the Taylors.			
153.	9/7/2016 email from AOne to HEFG regarding a past- due balance and outstanding invoices.			
154.	9/28/2016 Namecheap order summary reflecting renewal of the meettheblacksthemovie.com and hiddenempirefilmgroup.com domains by AOne.			
155.	10/3/2016 email regarding			



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1	rights.		
2	<b>161.</b> 2/24/2017 fully executed 3 agreement documenting the 4 sale of HSK digital media 5 assets from AOne to HEFG.		
6	<b>162.</b> 4/24/2017 email regarding 7 HSK publishing partnership 8 terms, revised agreements, 9 and a 70/30 revenue split.		
10	<b>163.</b> 5/17/2017 text message 11 exchange in which Deon 12 Taylor refers to the social 13 media budget in connection 14 with “our company” and 15 Angelone.		
16	<b>164.</b> 8/17/2017 email from AOne 17 to HEFG transmitting a past- 18 due payment demand and 19 attached invoices for HEFG, 20 Meet the Blacks, and 21 Supremacy projects.		
22	<b>165.</b> 8/19/2017 text message in 23 which Deon Taylor states 24 “We’re building a 25 company!!” in relation to 26 work with Angelone.		
27	<b>166.</b> 8/19/2017 text message in		
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1	which Deon Taylor states		
2	“Build a 100 million dollar		
3	company!” regarding		
4	business plans with		
5	Angelone.		
6	<b>167.</b> 9/13/2017 Namecheap auto-		
7	renewal invoice for HEFG		
8	and Meet the Blacks		
9	domains paid by AOne.		
10	<b>168.</b> 10/9/2017 text message from		
11	Deon Taylor referencing “3		
12	years... still at it” in relation		
13	to ongoing work with		
14	Angelone.		
15	<b>169.</b> 10/18/2017 Google		
16	Workspace “Welcome”		
17	email for the		
18	hiddenempirefilmgroup.com		
19	domain listing derrick@ as		
20	administrator.		
21	<b>170.</b> 10/23/2017 email from		
22	Angelone creating a		
23	hiddenempirefilmgroup.com		
24	email account for Omar		
25	Joseph.		
26	<b>171.</b> 11/1/2017 email confirming		
27	Google Workspace billing		
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1	for		
2	hiddenempirefilmgroup.com		
3	set up through AOne.		
4	<b>172.</b> 11/2/2017 email from AOne		
5	outlining proposed \$20,000-		
6	per-month service scope for		
7	HEFG digital and marketing		
8	services.		
9	<b>173.</b> 11/16/2017 email between		
10	Roxanne Taylor and		
11	Angelone itemizing Traffik		
12	digital marketing costs.		
13	<b>174.</b> 11/29/2017 email from		
14	Roxanne Taylor proposing a		
15	discussion about company		
16	structure and a bank account		
17	for referred clients.		
18	<b>175.</b> 12/6/2017 text message in		
19	which Deon Taylor assigns		
20	Angelone responsibility for		
21	Optimad/Alabama political		
22	social media spending.		
23	<b>176.</b> 1/10/2018 email from		
24	Roxanne Taylor requesting		
25	creation of email forwarders		
26	for multiple HEFG email		
27	accounts.		
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1	<b>177.</b>	1/16/2018 email transmitting AOne's 2018 HEFG annual digital budget proposal.		
2	<b>178.</b>	1/17/2018 email from Lionsgate/Code Black (Jeff Clanagan) concerning wage garnishment and an AOne payment dispute.		
3	<b>179.</b>	1/30/2018 email exchange regarding revised 2018 budget projections and partnership arrangements with Velma.		
4	<b>180.</b>	1/31/2018 email from Roxanne Taylor requesting creation of a Google Workspace account for Damien Douglas.		
5	<b>181.</b>	2/2/2018 email from Angelone recommending HEFG transition to Google Workspace tools for brand management.		
6	<b>182.</b>	2/2/2018 email documenting setup of <a href="mailto:roxanne@hiddenempirefilmgroup.com">roxanne@hiddenempirefilmgroup.com</a> , including		
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1	2	administrative access credentials.		
3	4	183. 2/2/2018 Google Workspace 5 welcome emails for Roxanne 6 Taylor, Velma, and Omar for 7 hiddenempirefilmgroup.com 8 accounts.		
9	10	184. 2/8/2018 email from AOne 11 to Velma, Deon, and 12 Roxanne regarding past-due 13 managed-services fees and 14 reimbursement of 15 advertising spend.		
16	17	185. 2/13/2018 email from 19 Angelone explaining per- 20 user Google Workspace 21 billing and the impact of 22 additional HEFG users on 23 AOne's costs.		
24	25	186. 2/22/2018 email from 26 Roxanne Taylor directing 27 AOne to create corporate 28 email accounts for Robert Smith and Omar.		
29	30	187. 2/22/2018 email confirming 31 creation of 32 deon@hiddenempirefilmgro		

	up.com with administrative credentials.		
<b>188.</b>	2/24/2018 email discussing the 2018 HEFG budget and proposed Hyper Engine equity structure.		
<b>189.</b>	2/25/2018 demand email from Kathleen Warden regarding unpaid nanny wages and related judgment.		
<b>190.</b>	2/26/2018 draft Hyper Engine presentation deck identifying Deon Taylor, Roxanne Taylor, and Darrick Angelone as company executives.		
<b>191.</b>	2/28/2018 email addressing Hyper Engine LLC entity structure and website development planning.		
<b>192.</b>	3/1/2018 first executed Hyper Engine LLC Operating Agreement setting forth partnership, management, and equity allocations.		
<b>193.</b>	3/1/2018 email exchange		



1	2	3	4	among Deon, Roxanne, and Darrick regarding revisions to the Hyper Engine presentation deck.	5	6	7	8	9
10	11	12	13	<b>194.</b> 3/1/2018 California Secretary of State filing for Hyper Engine LLC submitted by Velma.	14	15	16	17	18
19	20	21	22	<b>195.</b> 3/2/2018 email from Hyper Engine pitching digital marketing services to a prospective client.	23	24	25	26	27
28	<b>196.</b> 3/5/2018 email confirming hyperengine.ai email forwarding for Darrick, Deon, and Roxanne.	29	30	31	32	33	34	35	36
37	<b>197.</b> 3/5/2018 email discussing a potential new Hyper Engine client opportunity.	38	39	40	41	42	43	44	45
46	<b>198.</b> 3/6/2018 email exchanges concerning Hyper Engine joint venture arrangements and payment invoice processing.	47	48	49	50	51	52	53	54
55	<b>199.</b> 3/14/2018 email from Roxanne Taylor directing deletion or hiding of the	56	57	58	59	60	61	62	63

	info@hiddenempirefilmgroup.com catch-all email address.		
200.	3/22/2018 email from AOne to Velma demanding payment of the March 2018 invoice and identifying outstanding balances.		
201.	3/29/2018 email from AOne to HEFG personnel regarding February 2018 invoice payment status.		
202.	3/30/2018 email from AOne to Velma and Deon Taylor transmitting revised February and March 2018 invoices and advertising-spend advance details.		
203.	3/30/2018 email from Velma stating she forgot her Google Workspace password and requesting assistance.		
204.	4/23/2018 emails regarding setup of a Google Workspace email account for Ali Lyons under the HEFG		



1	domain.		
2	<b>205.</b> 5/2/2018 email from AOne to HEFG personnel attaching more than \$70,000 in outstanding invoices for HEFG, Meet the Blacks, advertising purchases, and hosting services.		
3	<b>206.</b> 5/21/2018 email regarding creation of a Google Workspace account for Destanye Baldwin under the HEFG domain.		
4	<b>207.</b> 5/21/2018 Hyper Engine team meeting calendar invitation including Roxanne, Velma, and public-relations participants.		
5	<b>208.</b> 5/21/2018 email from AOne to HEFG personnel regarding past-due invoices and AOne's credit-card charges for project expenses.		
6	<b>209.</b> 6/5/2018 email from Shandra requesting creation of a Google Workspace account for Shawn Edwards under		
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1	the HEFG domain.		
2	<b>210.</b> 7/17/2018 email confirming setup of the Google Workspace account shawn@hiddenempirefilmgroup.com.		
3	<b>211.</b> 7/19/2018 email from AOne proposing a \$59,000 settlement to resolve outstanding invoices between AOne and HEFG.		
4	<b>212.</b> 8/8/2018 Google Workspace password-reset notice for Ali's account initiated by administrator Darrick Angelone.		
5	<b>213.</b> 8/10/2018 emails regarding setup of the Google Workspace account rtaylor_asst@hiddenempirefilmgroup.com for Destanye.		
6	<b>214.</b> 8/24/2018 Google Workspace password-reset notices for Suzanne's account.		
7	<b>215.</b> 8/27/2018 Namecheap virtual private server (VPS)		
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1	order confirmation for HEFG website hosting paid by AOne.		
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4	<b>216.</b> 8/28/2018 email between Deon Taylor and Darrick Angelone regarding Gillum campaign digital strategy and related wire-transfer information.		
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11	<b>217.</b> 9/10/2018 email thread describing Hyper Engine capabilities and proposed targeting strategy for the Proposition 10 campaign.		
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16	<b>218.</b> 9/11/2018 email from AOne to HEFG personnel regarding a payment demand for invoices described as approximately two years old.		
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21	<b>219.</b> 9/11/2018 email from Velma stating that approximately \$800,000 has been awarded for the Proposition 10 campaign and requesting a Hyper Engine proposal.		
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27	<b>220.</b> 9/15/2018 Namecheap order confirmation for registration		
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	of bewoke.vote and related domains billed to AOne.		
<b>221.</b>	9/15/2018 email among Roxanne, Darrick, Robert Smith, and public-relations personnel regarding Be Woke trademark searches and naming options.		
<b>222.</b>	9/16/2018 email confirming setup of the Google Workspace account james@hiddenempirefilmgroup.com.		
<b>223.</b>	9/21/2018 email from AOne to Roxanne describing Be Woke and Hyper Engine digital-media strategy and media plans.		
<b>224.</b>	9/25/2018 email from Deon Taylor discussing potential changes to the Hidden Empire Film Group name in light of domain and trademark issues.		
<b>225.</b>	11/7/2018 Google Workspace migration notice for HEFG email accounts		



1	reflecting migration to G		
2	Suite administered by AOne.		
3	<b>226.</b> 11/8–11/12/2018 Google		
4	Workspace password-reset		
5	notices for accounts		
6	including Damien, Suzanne,		
7	Velma, Karen, Omar, and		
8	others.		
9			
10	<b>227.</b> 11/10/2018 Google		
11	Workspace password-reset		
12	notices for Deon Taylor and		
13	other HEFG staff accounts.		
14			
15	<b>228.</b> 11/11–December 2018		
16	Google Workspace		
17	password-reset notices for		
18	accounts including Sean and		
19	Shandra.		
20			
21	<b>229.</b> 11/15, 11/20, 11/27, and		
22	12/6/2018 Google		
23	Workspace password-reset		
24	notices for Shawn and		
25	Karen.		
26			
27	<b>230.</b> 12/12/2018 Namecheap VPS		
28	auto-renewal notice for		
	server1.hiddenempirefilmgro		
	up.com billed to AOne.		
	<b>231.</b> 12/12/2018 Google		



1	2	Workspace password-reset notice for Ryan's account.		
3	4	5	6	7
232.	12/17/2018 Google Workspace password-reset notice for Deon Taylor's account.			
8	9	10	11	12
233.	2/4/2019 email summarizing HEFG, Be Woke, and Hyper Engine team call, including digital-strategy items led by Derrick Angelone.			
13	14	15	16	17
234.	2/15/2019 email regarding development of a Hyper Engine presentation deck and project list among executive-team members.			
18	19	20	21	22
235.	2/23/2019 Google Workspace password-reset notice for Greg Wise's account.			
23	24	25	26	27
236.	3/19/2019 Google Workspace password-reset notice for Omar's account.			
28	29	30	31	32
237.	4/8/2019 email stating that Hyper Engine clients will receive access to a PSA content vault.			

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1	<b>238.</b>	6/6/2019 Google Workspace password-reset notice for the generic “Office” account.		
2	<b>239.</b>	7/2/2019 and 7/8/2019 Google Workspace password-reset notices for Roxanne Taylor’s account.		
3	<b>240.</b>	7/23/2019 United States Patent and Trademark Office registration record for the “Hidden Empire” trademark issued to Chalant Phifer.		
4	<b>241.</b>	8/14/2019 email from Sony executive Yvonne Abt seeking to connect with Hyper Engine and Darrick Angelone regarding the film “Black and Blue.”		
5	<b>242.</b>	8/16/2019 Namecheap renewal confirmations for multiple Be Woke-related domains billed to AOne.		
6	<b>243.</b>	8/16/2019 email from Hyper Engine outlining proposed pricing and billing structure for digital-marketing services.		
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1	<b>244.</b>	8/16/2019 email from 2 Roxanne Taylor to Marian 3 Koltai describing Hyper 4 Engine and the parties' 5 marketing-company 6 relationship.		
7	<b>245.</b>	8/16/2019 and 8/17/2019 9 emails from Velma 10 summarizing Hyper Engine 11 operating-agreement terms 12 and equity percentages.		
13	<b>246.</b>	9/4/2019 email thread among 14 Sony executive Yvonne Abt, 15 Hyper Engine, and HEFG 16 representatives regarding a 17 proposed \$75,000 influencer 18 campaign for “Black and 19 Blue.”		
20	<b>247.</b>	9/6/2019 Google Workspace 21 password-reset notice for 22 Omar’s account.		
23	<b>248.</b>	9/10/2019 email from 24 Darrick Angelone to Sony 25 confirming key performance 26 indicators and pricing terms 27 for the “Black and Blue” 28 campaign.		



1	<b>249.</b>	9/10/2019 internal email regarding brainstorming and strategy for the Sony “Black and Blue” proposal.		
2	<b>250.</b>	9/10/2019 email confirming final terms of the agreement between Hyper Engine and Sony for the “Black and Blue” digital-marketing campaign.		
3	<b>251.</b>	9/11/2019 email from Velma attaching Hyper Engine operating agreement and EIN relating to entity status.		
4	<b>252.</b>	9/18/2019 email from Deon introducing the Hyper Engine team, including Angelone, to Warner Bros. regarding the Motherless Brooklyn project.		
5	<b>253.</b>	9/21/2019 email from Roxanne regarding opening a Hyper Engine Bank of the West account, including signature cards and wire information.		
6	<b>254.</b>	9/21/2019 email regarding		



1	issuance of debit cards for		
2	Deon, Roxanne, and Darrick		
3	on the Hyper Engine bank		
4	account.		
5	<b>255.</b> 9/30/2019 internal email		
6	regarding Black & Blue		
7	campaign deliverables and		
8	Darrick's request for		
9	updates.		
10	<b>256.</b> 9/30/2019 email		
11	correspondence with Sony		
12	regarding Black & Blue		
13	campaign deliverables.		
14	<b>257.</b> 10/1/2019 email providing a		
15	Hyper Engine campaign		
16	update to Sony, including		
17	influencer metrics and		
18	execution details.		
19	<b>258.</b> 10/2/2019 email transmitting		
20	a Hyper Engine Motherless		
21	Brooklyn one-sheet and		
22	discussing requested		
23	campaign budget.		
24	<b>259.</b> 10/4/2019 Hyper Engine		
25	proposal outlining digital		
26	marketing services for the		
27	Mutha brand.		
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1	<b>260.</b>	10/11/2019 email correspondence with Warner Bros. marketing regarding the Motherless Brooklyn campaign.		
2	<b>261.</b>	10/15/2019 coordination emails between Warner Bros. and Hyper Engine regarding campaign logistics and influencer planning.		
3	<b>262.</b>	10/18/2019 email from Roxanne regarding AONE's tracking of Black & Blue influencer posts.		
4	<b>263.</b>	10/23/2019 email transmitting a Hyper Engine invoice and bank wire instructions to Sony.		
5	<b>264.</b>	10/23/2019 email correspondence with Sony regarding payment coordination and wiring details for a Hyper Engine LLC invoice.		
6	<b>265.</b>	10/25/2019 email from Roxanne directing that work and invoicing be processed		
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1	through Hyper Engine.		
2	<b>266.</b> 10/25/2019 email discussing 3 Hyper Engine margin and 4 agency fee structure for the 5 Black History in Two 6 Minutes project.		
7	<b>267.</b> 10/27/2019 Namecheap 8 receipt for VPS hosting 9 renewal for 10 hiddenempirefilmgroup.com.		
11	<b>268.</b> 11/4/2019 email from 12 Roxanne to attorney 13 Christopher Fry describing 14 Hyper Engine ownership 15 structure and equity split.		
16	<b>269.</b> 11/25/2019 email from 17 Velma proposing revised 18 Hyper Engine operating 19 agreement terms, including 20 asset ownership and agency 21 fee split.		
22	<b>270.</b> 11/26/2019 Hyper Engine 23 check in the amount of 24 \$4,600 to Stable Bags from 25 an HEFG account.		
26	<b>271.</b> 11/27/2019 Namecheap 27 receipt for HEFG hosting		



1	renewal billed to AONE.		
2	<b>272.</b> 12/1/2019 fully executed 2019 Hyper Engine Operating Agreement reflecting ownership and management terms.		
3	<b>273.</b> 12/10/2019 email regarding setup of a new HEFG email account for Sean Miller following promotion to office manager.		
4	<b>274.</b> 12/12/2019 VPS Quasar auto-renewal notice for HEFG hosting services.		
5	<b>275.</b> 12/21/2019 Google password reset notice for Omar's account.		
6	<b>276.</b> 12/27/2019 Namecheap payment receipt for hosting renewal for an HEFG server.		
7	<b>277.</b> 12/30/2019 Hyper Engine check no. 104 for \$12,500 relating to a Mercedes vehicle lease.		
8	<b>278.</b> 1/9/2020 Hyper Engine check no. 105 for \$117,152.03, signed by		
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1	Roxanne, relating to a Tesla		
2	vehicle purchase.		
3	<b>279.</b> 1/23/2020 email thread		
4	regarding Hyper		
5	Engine/HEFG public-		
6	relations launch and PMK		
7	press.		
8	<b>280.</b> 1/30/2020 email		
9	summarizing an		
10	HEFG/Hyper Engine team		
11	meeting regarding websites,		
12	public relations, Black		
13	History in Two Minutes, and		
14	PMK.		
15	<b>281.</b> 2/3/2020 Google Workspace		
16	notice of password reset for		
17	the “Michael” account		
18	performed by administrator		
19	Angelone.		
20	<b>282.</b> 3/3/2020 email from		
21	Roxanne regarding late		
22	payments and requesting that		
23	Darrick pause while Deon		
24	addresses outstanding		
25	amounts.		
26	<b>283.</b> 3/6/2020 email from AONE		
27	demanding past-due		
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1	payments and attaching invoices for HEFG-related costs.		
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4	<b>284.</b> 4/21/2020 email from Deon directing Darrick to lead Robert F. Smith digital and social media management with Terakeet.		
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10	<b>285.</b> 4/24/2020 email regarding status of and payments on January–March 2020 invoices for HEFG, Be Woke, and Black History in Two Minutes, including staffing impacts.		
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17	<b>286.</b> 5/1/2020 audio recording of discussion between Deon and Darrick regarding digital film campaign concepts.		
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21	<b>287.</b> 5/7/2020 audio recording of discussion between Deon and Darrick regarding use of automation tools for online voting.		
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26	<b>288.</b> 5/7/2020 audio recording of discussion between Deon and Darrick regarding a		
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1	\$4,000 budget for a paid 2 campaign relating to 3 Robert's nomination.		
4	<b>289.</b> 6/8/2020 First Amended 5 Complaint in Phifer v. Deon 6 Taylor et al., Sacramento 7 action alleging breach of 8 contract and related claims.		
9	<b>290.</b> 7/1/2020 email from AONE 10 demanding payment of 11 outstanding Black History in 12 Two Minutes, HEFG, and 13 Be Woke invoices, G Suite 14 charges, domain costs, and 15 advertising spend 16 reimbursements.		
17	<b>291.</b> 7/7/2020 email transmitting 18 a Hyper Engine digital 19 marketing strategy deck for 20 the Work Vineyard project 21 to Lamy.		
22	<b>292.</b> 7/17/2020 email regarding 23 notice of a bounced check 24 and request for replacement 25 wire payment from HEFG.		
26	<b>293.</b> 7/22/2020 audio recording in 27 which Roxanne describes the		
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1	2	3	4	Be Woke project setup, introduces Erin Harris, and asks Darrick to assemble a campaign team.	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
294.	8/4/2020 email from Darrick to Lamya describing Hyper Engine as a joint venture with Roxanne and partners for the Work Vineyard project.	295.	8/5/2020 fully executed Work Vineyard social and digital services agreement between Lamya and Angelone on behalf of Hyper Engine.	296.	8/15/2020 Namecheap order confirmation for auto- renewal of bewoke.vote and woke.vote domains billed to AONE.	297.	8/23/2020 audio recording of discussion in which Deon directs launch of the Be Woke “Kennedy” campaign with Darrick handling digital operations and budget.																					



1	<b>298.</b>	9/2/2020 email from BLOC campaign counsel Littman regarding issues raised about commitments and Facebook group use by Deon and Hyper Engine.		
2	<b>299.</b>	9/20/2020 email from Pauline Fischer introducing Derrick to BRON as a Be Woke co-founder and partner of Deon and Roxanne.		
3	<b>300.</b>	10/27/2020 Namecheap receipt showing hosting payment for hiddenempirefilmgroup.com made by Angelone.		
4	<b>301.</b>	10/31/2020 email thread regarding Hawkfish engagement terms, fees, and donor messaging.		
5	<b>302.</b>	10/31/2020 email with Hawkfish statement of work and media plan for national campaign involving HEFG/Hyper Engine.		
6	<b>303.</b>	11/1/2020 email exchange		



1	2	3	among executives regarding Hawkfish engagement and sponsor communications.	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
304.	11/10/2020 Namecheap auto-renewal notice for deontaylor.com, deontaylorfilms.com, and hiddenempirefilms.com billed to Angelone.																											
305.	11/10/2020 executed master services agreement between Lionsgate and Hyper Engine for creative and marketing services.																											
306.	11/10/2020 email discussing active HEFG/Be Woke/BHITM projects and web, social, and marketing priorities.																											
307.	11/10/2020 email from Hawkfish representative Andrea Gellert regarding creative content and campaign metrics.																											
308.	11/12/2020 email from Angelone providing BHITM cost and invoice breakdown,																											



1	including work, audiences, and balances.		
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3	<b>309.</b> 11/12/2020 email from Roxanne Taylor to Bank of the West requesting closure of a Hyper Engine account associated with Angelone.		
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8	<b>310.</b> 11/27/2020 Namecheap receipt reflecting renewal payment for hiddenempirefilmgroup.com hosting charged to Angelone.		
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15	<b>311.</b> 12/7/2020 email attaching Hyper Engine/Be Woke statement of work outlining scope, rates, and reimbursement terms.		
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20	<b>312.</b> 12/10/2020 audio recording of discussion between Deon Taylor and Angelone regarding influencer Karesh and next steps on a campaign.		
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26	<b>313.</b> 12/11/2020 email documenting Erin Harris's password reset request and		
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1	Angelone's assistance.		
2	<b>314.</b> 12/15/2020 Hyper Engine Invoice No. 1232 to Lionsgate in the amount of \$165,000 for Fatale campaign marketing services.		
3	<b>315.</b> 12/16/2020 email introducing Angelone as “head of digital” operating Hyper Engine, described as the digital arm of Hidden Empire, to Ciroc/Lionsgate partners.		
4	<b>316.</b> 12/23/2020 email and attached report summarizing Hyper Engine Fatale influencer campaign performance circulated to HEFG and Lionsgate recipients.		
5	<b>317.</b> 1/1/2021 audio recording in which Deon Taylor asks Angelone to upload a campaign video and references difficulty accessing an account.		
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1	<b>318.</b>	1/6/2021 email discussing BHITM payments, budget approval, and feedback from Dyllan McGee regarding digital rollout.		
2	<b>319.</b>	2/8/2021 email setting out annual BHITM/Hyper Engine operating budget, including monthly ranges and approximately 39 domains and related digital assets.		
3	<b>320.</b>	2/8/2021 email exchange between Roxanne Taylor and Angelone regarding BHITM margins, costs, domains, and social media management.		
4	<b>321.</b>	2/22/2021 audio recording of Deon Taylor discussing BHITM finances, Robert F. Smith funding, and compensation for Angelone.		
5	<b>322.</b>	2/24/2021 email from Deon Taylor forwarding a Robert F. Smith Google Alert to Angelone and requesting client-related handling.		
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1	<b>323.</b>	3/1/2021 email from Angelone to Roxanne Taylor regarding past-due amounts and request for a complete invoice list.		
2	<b>324.</b>	3/1/2021 email and invoice concerning Work Vineyard billing, including Hyper Engine invoices to Lamy and comments on project profitability.		
3	<b>325.</b>	3/12/2021 email from Roxanne Taylor to CPA regarding Hyper Engine operating agreement membership and ownership structure.		
4	<b>326.</b>	3/17/2021 email from Roxanne Taylor directing Angelone to create a HEFG email account for new COO Quincy Newell and assist with onboarding.		
5	<b>327.</b>	3/17/2021 email introducing Quincy Newell as COO and requesting Angelone's assistance with IT integration and workflow.		



1	328.	3/19/2021 email exchange regarding BHITM terms, including communications with McGee Media and client payment arrangements.		
2	329.	3/23/2021 weekly HEFG/Hyper Engine staff recap email covering THND, CLIMB, BHITM, newsletter, social media, and e-commerce items.		
3	330.	3/26/2021 Hyper Engine 2021 company presentation deck listing Angelone as CTO, Roxanne Taylor as CEO, Deon Taylor as CCO, and describing client portfolio.		
4	331.	4/2/2021 email from Quincy Newell requesting information from Angelone on Hyper Engine team members and resources for upcoming projects.		
5	332.	4/4/2021 email and organizational chart from Angelone to Quincy Newell		



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1	digital and social planning.		
2	<b>337.</b> 4/26/2021 email from Angelone to Quincy, Roxanne, and Deon Taylor transmitting THND digital roadmap and proposed budget.		
3	<b>338.</b> 5/6/2021 THND/MTB2 marketing meeting agenda listing attendees including Angelone and studio marketing personnel.		
4	<b>339.</b> 5/19/2021 audio recording of Deon Taylor dictating BHITM Webby Awards social media post content and addressing the team.		
5	<b>340.</b> 5/21/2021 audio recording of Deon Taylor providing Danny Trejo contact information to Angelone for THND promotional outreach.		
6	<b>341.</b> 5/21/2021 audio recording of Deon Taylor providing King Bach contact information to Angelone for THND digital		
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1	promotion.		
2	<b>342.</b> 5/22/2021 audio recording of Deon Taylor discussing influencer outreach and paid collaborations for campaign activity with Angelone.		
3	<b>343.</b> 5/31/2021 email exchange regarding potential THND media buy on Pornhub and discussion of how the media source would be described.		
4	<b>344.</b> 5/31/2021 email from Angelone referencing THND exhibitor creative and prior plans in response to the proposed Pornhub advertising.		
5	<b>345.</b> 5/31/2021 email and associated creative materials in which Hyper Engine sends THND exhibitor graphic and Lionsgate confirms the graphic originated from HEFG/Hyper Engine.		
6	<b>346.</b> 6/4/2021 email from publicist Shandra identifying		
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1	Hyper Engine staff as		
2	“Partners: Deon, Roxanne,		
3	Darrick” for IMDb purposes		
4	and discussing timing with		
5	Roxanne.		
6	<b>347.</b> 6/8/2021 THND/MTB2 June		
7	8 campaign meeting agenda		
8	including studio PR, social		
9	media, talent, and Angelone		
10	among participants.		
11	<b>348.</b> 6/14/2021 audio recording of		
12	Deon Taylor describing		
13	Angelone’s role in		
14	campaigns and discussing		
15	adaptation to studio		
16	protocols.		
17	<b>349.</b> 6/21/2021 email between		
18	Velma and Roxanne Taylor		
19	discussing potential removal		
20	of AOne/Robert Smith from		
21	the Hyper Engine operating		
22	agreement.		
23	<b>350.</b> 7/6/2021 email from		
24	Angelone summarizing		
25	requested payments for		
26	approximately \$36,000 in ad		
27	spend, \$7,000 Duval event		
28	cost, and \$2,000 Work		

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1	Vineyard cost, with 2 supporting invoices and 3 screenshots attached.		
4	<b>351.</b> 7/13/2021 email from 5 Quincy Newell to Darrick 6 Angelone regarding strategy 7 for the film “Survivor” and 8 potential Hyper Engine 9 support.		
10	<b>352.</b> 7/29/2021 HEFG weekly 11 team meeting notes 12 identifying Damon Wolf as 13 FEAR marketing lead and 14 listing Darrick Angelone on 15 the strategy team.		
16	<b>353.</b> 8/2/2021 email chain 17 regarding coordination of 18 FEAR social channel launch 19 among Damon Wolf, 20 Darrick Angelone, Deon 21 Taylor, and Roxanne Taylor, 22 including timing with public- 23 relations activities.		
24	<b>354.</b> 8/3/2021 email from Darrick 25 Angelone transmitting a 26 consolidated invoice list for 27 THND, HEFG, Work 28 Vineyard, BHITM, Be		



1	Woke, CLIMB, server, Google Workspace, and domain charges.		
2	355. 8/4/2021 email regarding FEAR social launch plan involving Shandra, Shawn, and Darrick Angelone, including social-media strategy and feedback.		
3	356. 8/6/2021 emails and receipts reflecting Namecheap registrations of multiple “hiddenempire” and related project domains by AOne.		
4	357. 8/7/2021 email from Roxanne Taylor circulating a draft FEAR landing page to Damon Wolf, Darrick Angelone, Deon Taylor, and Quincy Newell for review.		
5	358. 8/9/2021 email from Velma directing Darrick Angelone to reset Michael Claps’s email account password.		
6	359. 8/9/2021 email thread in which Roxanne Taylor directs forwarding of		
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1	Michael Claps's email to her 2 account and Darrick 3 Angelone implements the 4 forwarding.		
5	<b>360.</b> 8/17/2021 email regarding 6 setup of 7 support@climborganization. 8 org Google Workspace 9 account by Darrick 10 Angelone for the CLIMB 11 project.		
12	<b>361.</b> 8/22/2021 email from 13 Roxanne Taylor to Darrick 14 Angelone requesting 15 assistance with logging in to 16 her Instagram account.		
17	<b>362.</b> 9/2/2021 FEAR release 18 planning email chain 19 including Darrick Angelone, 20 HEFG executives, and 21 distributors regarding digital 22 and creative campaign plans.		
23	<b>363.</b> 9/7/2021 email from 24 Roxanne Taylor 25 acknowledging partial 26 payment of invoices, 27 requesting confirmation of 28 the invoice list, and		



1	scheduling a budget meeting		
2	with Deon Taylor.		
3	<b>364.</b> 9/7/2021 email from Darrick		
4	Angelone transmitting		
5	unpaid invoices for HEFG,		
6	THND, Work Vineyard,		
7	BHITM, FEAR, Google		
8	Workspace, server, and		
9	domain services.		
10	<b>365.</b> 9/7/2021 email documenting		
11	a password reset for Sean		
12	Miller's Google Workspace		
13	account and his confirmation		
14	of access.		
15	<b>366.</b> 9/7/2021 packet of invoices		
16	attached to email, including		
17	BHITM, FEAR, HEFG		
18	monthly, Work Vineyard,		
19	THND, Google Workspace,		
20	and domain invoices.		
21	<b>367.</b> 9/7/2021 Google		
22	administrative log entry		
23	reflecting an administrator		
24	password reset on Sean		
25	Miller's account by Darrick		
26	Angelone.		
27	<b>368.</b> 9/13/2021 audio recording of		
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1	Deon Taylor and Darrick Angelone discussing a Be Woke campaign plan for Denver, including references to Don Cheadle and Chauncey Billups.		
7	<b>369.</b> 9/30/2021 email from Darrick Angelone distributing a FEAR cast social-media toolkit and posting instructions.		
12	<b>370.</b> 10/4/2021 email invitation for a FEAR weekly marketing Zoom meeting listing Darrick Angelone, Quincy Newell, and other marketing participants.		
19	<b>371.</b> 10/6/2021 audio recording of Deon Taylor asking Darrick Angelone to create a Forbes- style meme or headline for Robert F. Smith.		
24	<b>372.</b> 10/6/2021 audio recording providing additional detail regarding the requested Robert F. Smith meme or headline.		



1	<b>373.</b>	10/11/2021 email from Kirkland & Ellis partner Sarkis Jebejian to Darrick Angelone regarding delivery of BHITM video materials.		
2	<b>374.</b>	10/14/2021 email chain concerning vaccine campaign creative materials, including circulation of “Truth” videos and identification of target states.		
3	<b>375.</b>	10/14/2021 audio recording of Deon Taylor discussing episode status for a campaign with Darrick Angelone and Roxanne Taylor and referencing payment issues.		
4	<b>376.</b>	10/18/2021 agenda for a CNBC vaccine public-service-announcement call outlining BHITM, Hyper Engine, and HEFG deliverables and creative plan.		
5	<b>377.</b>	10/18/2021 email from Darrick Angelone discussing Hyper Engine performance,		



1	alignment, and his role in 2 managing the business.		
3	<b>378.</b> 10/19/2021 audio recording 4 of Deon Taylor requesting a 5 John Lewis film-related 6 meme or headline featuring 7 Deon Taylor and HEFG.		
8	<b>379.</b> 10/19/2021 audio recording 9 providing additional 10 instructions regarding the 11 John Lewis film meme, 12 including headline and 13 image details.		
14	<b>380.</b> 10/27/2021 Namecheap 15 receipt showing renewal 16 payment by Darrick 17 Angelone for hosting of 18 hiddenempirefilmgroup.com.		
19	<b>381.</b> 11/16/2021 audio recording 20 of Deon Taylor asking 21 Darrick Angelone to allocate 22 advertising budget to 23 promote links concerning 24 Robert F. Smith.		
25	<b>382.</b> 11/18/2021 recurring 26 calendar invitation for FEAR 27 weekly marketing Zoom		
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1	meetings including Darrick 2 Angelone, Roxanne Taylor, 3 Deon Taylor, and Damon 4 Wolf.		
5	<b>383.</b> 11/27/2021 Namecheap 6 receipt reflecting additional 7 hosting renewal payment by 8 Darrick Angelone for 9 hiddenempirefilmgroup.com.		
10	<b>384.</b> 11/29/2021 email from 11 Darrick Angelone 12 transmitting a Fear Game 13 and NFT pitch deck to Deon 14 Taylor, Omar Joseph, 15 Quincy Newell, and 16 Roxanne Taylor.		
17	<b>385.</b> 11/29/2021 group audio 18 recording discussing a Meet 19 the Blacks NFT project and 20 requested terms and setup.		
21	<b>386.</b> 12/1/2021 calendar 22 invitation for a FEAR 23 weekly marketing Zoom 24 meeting listing Darrick 25 Angelone and other 26 participants.		
27	<b>387.</b> 12/30/2021 email and		
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1	attached contract regarding the CNBC vaccine education campaign, including execution details sent to Darrick Angelone.		
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6	<b>388.</b> 1/13/2022 email from Darrick Angelone to Damon Wolf, Omar Joseph, Deon Taylor, and Roxanne Taylor outlining a FEAR “viral activation” concept, including Instagram filter and TikTok ideas.		
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15	<b>389.</b> 1/15/2022 email from Damon Wolf responding to and endorsing Darrick Angelone’s FEAR activation concepts.		
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20	<b>390.</b> 1/17/2022 email from Roxanne Taylor confirming agency engagement for FEAR and stating that campaign costs require her prior budget approval.		
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26	<b>391.</b> 1/19/2022 email and statement of work from Darrick Angelone providing a 2022 cost breakdown for		
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1	Google Workspace, domains, servers, social media, and digital marketing services for HEFG.		
2	392. 1/20/2022 email in which Darrick Angelone labels FEAR activation, NFT, and game materials as “KEEP CONFIDENTIAL.”		
3	393. 1/24/2022 email describing FEAR Instagram filter shoot logistics and coordination of cast content among Darrick Angelone, Omar Joseph, and Roxanne Taylor.		
4	394. 1/30/2022 loan documentation reflecting a \$25,000 AOne loan secured by \$100,000 collateral subsequently lost in lender bankruptcy.		
5	395. 1/30/2022 iMessage thread among Darrick Angelone, Deon Taylor, and Omar Joseph discussing budgets, timing, creative elements, and advertising spend for the FEAR game and film.		



1	<b>396.</b>	1/31/2022 email from Derrick Angelone to HEFG providing a complete invoice summary through 2021 and identifying outstanding balances.		
2	<b>397.</b>	2/11/2022 audio recording of Deon Taylor explaining that CNBC campaign work is delayed due to client approvals rather than actions by Derrick Angelone.		
3	<b>398.</b>	2/12/2022 audio recording of Deon Taylor asking Derrick Angelone for assistance configuring email on a new iPhone.		
4	<b>399.</b>	2/15/2022 Hyper Engine strategy deck and proposal for Pathways, including digital, creative, and key performance indicator plans.		
5	<b>400.</b>	2/21/2022 email from Derrick Angelone introducing attorney Darrell Thompson to Deon Taylor, Roxanne Taylor, and Quincy Newell regarding Hyper		



1	Engine partnership issues.		
2	<b>401.</b> 2/22/2022 press release announcing partnership among Hyper Engine, Reach TV, and Black History in Two Minutes.		
3	<b>402.</b> 2/26/2022 audio recording of discussion regarding a proposed Zoom/FaceTime meeting about the FEAR game/film and related communications involving Quincy and counsel.		
4	<b>403.</b> 2/28/2022 email from Darrick Angelone circulating FEAR digital and creative concepts, including proposed campaign budget and allocation.		
5	<b>404.</b> 3/2/2022 email thread regarding follow-up FEAR marketing discussions identifying Darrick Angelone as digital and creative lead.		
6	<b>405.</b> 3/16/2022 email from Velma requesting creation of		



1	accounting@hiddenempirefil mgroup.com Workspace account for Barbara.		
406.	3/16/2022 email confirming setup of the accounting@hiddenempirefil mgroup.com Workspace account for Barbara.		
407.	3/20/2022 complaint in Chris Cobb v. Hidden Empire and Deon Taylor asserting claims relating to alleged implied contract, conversion, and misrepresentation concerning creative work.		
408.	3/24/2022 audio recording in which Deon Taylor discusses an in-person Los Angeles meeting to review creative and web projects and having Derrick lead onboarding.		
409.	3/29/2022 email from counsel to Roxanne Taylor regarding nonpayment on the Be Woke Vote trademark matter and potential default.		
410.	3/31/2022 email from		



1	Derrick Angelone to Omar		
2	providing headshot and		
3	biography in connection with		
4	FEAR Game partnership		
5	development.		
6	<b>411.</b> 4/2/2022 audio recording in		
7	which Deon Taylor		
8	comments on BHITM video		
9	work and recommends paid		
10	posting on Facebook,		
11	referencing Derrick's role.		
12	<b>412.</b> 4/8/2022 email from Derrick		
13	Angelone requesting		
14	formalization of		
15	AOne/Hyper Engine joint		
16	venture terms and related		
17	business arrangements.		
18	<b>413.</b> 4/8/2022 audio recording in		
19	which Deon Taylor		
20	characterizes Hyper Engine		
21	as a banner and references		
22	AOne providing underlying		
23	technology services.		
24	<b>414.</b> 4/8/2022 audio recording		
25	continuing discussion of		
26	structural and organizational		
27	steps needed for Hyper		
28	Engine.		



1	415.	4/8/2022 audio recording in 2 which Deon Taylor discusses 3 financing Hyper Engine, 4 payments to Darrick and 5 team, and AOne's role in 6 providing technology.		
7	416.	4/21/2022 email from 8 Darrick to Quincy, copied to 9 Deon and counsel, 10 transmitting a FEAR 11 digital-marketing agreement 12 and plan.		
13	417.	4/25/2022 email from 14 Darrick to Roxanne 15 regarding server credentials 16 and related security 17 requirements referenced for 18 insurance purposes.		
19	418.	4/26/2022 email from 20 Darrick to Roxanne 21 providing additional server 22 access instructions and 23 security clarifications.		
24	419.	4/26/2022 audio recording in 25 which Deon Taylor 26 congratulates Darrick on an 27 award and seeks his views 28 on competing companies and		



1	marketing.		
2	420. 4/27/2022 web printout from a Robert F. Smith website listing Darrick Angelone as co-founder and creative director of Be Woke Vote.		
3	421. 5/3/2022 email from Darrick to HEFG stating that further work will pause until approximately 18 months of past-due balances are addressed.		
4	422. 5/3/2022 email from Roxanne and Quincy acknowledging the need to pause AOne services and requesting a meeting to discuss reduced scope.		
5	423. 5/3/2022 audio recording in which Deon Taylor discusses the absence of a signed Fear game agreement and the need for IP diligence.		
6	424. 5/3/2022 audio recording in which Deon Taylor describes Darrick's internal involvement with the movie		
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1	and emphasizes due		
2	diligence before launch.		
3	<b>425.</b> 5/3/2022 audio recording in		
4	which Deon Taylor		
5	addresses Darrick's tone		
6	regarding Aisha Tyler and		
7	emphasizes team alignment		
8	before public releases.		
9	<b>426.</b> 5/18/2022 audio recording in		
10	which Deon Taylor		
11	expresses interest in		
12	resuming work with Darrick		
13	and proposes an in-person		
14	planning meeting for the		
15	next campaign.		
16	<b>427.</b> 5/23/2022 email from		
17	Darrick outlining upcoming		
18	domain and server		
19	expirations and warning of		
20	potential data loss absent		
21	payment or transfer		
22	arrangements.		
23	<b>428.</b> 5/23/2022 iMessage thread		
24	between Deon and Darrick		
25	regarding Fear Game		
26	planning, including game		
27	and IP strategy.		
28			



1	429.	5/24/2022 email chain involving Skadden attorney Glen Mastroberte regarding Fear Game partnership terms and IP/rights negotiations.		
2	430.	5/24/2022 audio recording in which Deon Taylor characterizes the dispute as contractual, referencing unpaid invoices and asset issues, and calling for an agreement before game release.		
3	431.	6/4/2022 email from Damon Wolf discussing the value of AOne's contributions to campaigns and addressing resolution of a dispute.		
4	432.	6/23/2022 recurring calendar invitation for HEFG bi-weekly marketing strategy meeting listing Darrick among core participants.		
5	433.	6/23/2022 email from Terakeet regarding completion of Robert F. Smith-related work addressed to Darrick.		

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1	434.	7/11/2022 email from 2 Roxanne to Darrick 3 requesting reset of the 4 “Roxanne asst” Google 5 Workspace account for a 6 new assistant.		
7	435.	7/11/2022 Google 8 notification reflecting 9 password reset activity for 10 Roxanne’s assistant account 11 performed by administrator 12 Darrick.		
13	436.	7/18/2022 email regarding 14 continued troubleshooting 15 for new assistant Kazuko 16 Golden’s Google account.		
17	437.	7/27/2022 Namecheap 18 invoice for VPS Quasar 19 hosting renewal (July– 20 August 2022) for 21 hiddenempirefilmgroup.com 22 billed to AOne.		
23	438.	8/1/2022 email from Deon 24 acknowledging 25 approximately three months 26 of nonpayment and 27 indicating HEFG is prepared 28 to address outstanding		



1	invoices.		
2	<b>439.</b> 8/2/2022 email from Darrick to Sean Miller stating that Google services will be discontinued and offering options for transfer or migration.		
3	<b>440.</b> 8/2/2022 audio recording in which Deon Taylor confirms sending a wire transfer and discusses FEAR, gaming matters, and passcode handoff.		
4	<b>441.</b> 8/6/2022 TestFlight email from Apple confirming approval of Fear Game version 1.0.0 for beta testing under the AOne Creative account.		
5	<b>442.</b> 8/9/2022 email thread introducing attorney JT Fox as new counsel for AOne/Hyper Engine regarding payment and IP issues.		
6	<b>443.</b> 8/9/2022 email from Deon requesting that AOne cease		
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	using HEFG and partner names and asserting that Darrick does not own related IP.		
444.	8/9/2022 audio recording in which Deon Taylor confirms a wire transfer and again discusses FEAR/game matters and passcode transfer.		
445.	8/18/2022 TestFlight email from Apple confirming approval of Fear Game version 1.2.0 for beta testing.		
446.	8/22–10/7/2022 Google Workspace login logs reflecting successful logins by specified HEFG users during the period of the alleged lockout.		
447.	8/26/2022 email from Terakeet CEO Mac Cummings formally requesting transfer of Robert F. Smith Instagram and related social media assets from AOne.		



1	448.	8/29/2022 emails documenting LastPass credential transfer and confirmation of Robert F. Smith social asset handoff from AOne to Terakeet.		
2	449.	9/5–11/8/2022 Google support chat transcript with Roxanne regarding a “rogue admin,” Workspace administrator dispute, and account deletion issues.		
3	450.	9/6–10/11/2022 Google case 41009848 emails notifying Derrick of admin suspension, DNS/CNAME steps, and subsequent account deletion and recreation.		
4	451.	9/7/2022 OP Innovate Quote 1420 describing proposed incident response and influence-campaign services, including quoted fee of \$50,000 and language referencing “coerce/discredit Angelone,” prepared before filing of this action.		

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1	452.	9/7/2022 emails regarding Roxanne Taylor's instruction to wire \$25,000 to OP Innovate and inquiry about potential cyber-insurance coverage.		
7	453.	9/12/2022 initial complaint filed by Hidden Empire Film Group, Deon Taylor, and Roxanne Taylor asserting claims including Computer Fraud and Abuse Act, conversion, copyright, alleged account-access issues, and FEAR game intellectual property.		
18	454.	9/15/2022 ex parte application and proposed order for temporary restraining order and order to show cause re preliminary injunction concerning transfer of digital assets and related relief against AOne.		
26	455.	9/16/2022 order by Judge Fitzgerald denying temporary restraining order and setting order to show		



1	cause re preliminary injunction.		
2	456. 9/30–10/5/2022 emails between Darrick Angelone, HEFG, and FTI regarding Namecheap domain transfers and descriptions of website-related accounts.		
3	457. 10/1 and 10/4/2022 Namecheap email confirmations regarding auto-renewal notices and push-domain transfers of specified HEFG-related domains from AOne to Roxanne Taylor.		
4	458. 10/2–10/4/2022 emails between FTI personnel (including Jordan and Erin) and Darrick Angelone coordinating transfer of domains and social/web assets and confirming completion of transfers.		
5	459. 10/5/2022 Google Workspace billing notice stating that the subscription was suspended for		
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1	non-payment, affecting email service for the Workspace account.		
2	460. 10/10–11/1/2022 Google 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28	Workspace email correspondence regarding deletion of a prior Workspace account, restoration efforts, and instructions to create a new account.	
461.	10/13/2022 declaration of Darrick Angelone describing steps taken to comply with court orders, including transfers of digital assets and technical limitations following the injunction.		
462.	10/13/2022 email and Namecheap order records regarding expiration and renewal options for certain “hiddenempiremedia” domains following communications with HEFG.		
463.	9/8–9/9/2017 iMessage exchanges between Deon Taylor and Darrick		



1	2	Angelone regarding hiring and onboarding of personnel.	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28
464.	9/20/2019–11/30/2020 Bank of the West checking-account statements for Hyper Engine LLC reflecting transaction activity, service charges, and signatory information.																											
465.	Agreement dated April 26, 2012 between Hidden Empire Film Group and A One Entertainment LLC.																											
466.	Hyper Engine LLC Operating Agreement dated March 1, 2018.																											
467.	Hyper Engine LLC Operating Agreement dated December 1, 2018.																											
468.	Invoices issued by A One Entertainment LLC and/or Defendant Angelone to Hidden Empire Film Group or affiliated entities, dated various dates.																											
469.	Rate cards provided to Hidden Empire Film Group																											



1	or affiliated entities.		
2	<b>470.</b> 2018 spreadsheet listing domains and login credentials for Hidden Empire Film Group accounts.		
3	<b>471.</b> Email communications between Defendant Angelone and Plaintiff Roxanne Taylor.		
4	<b>472.</b> Documents and communications relating to marketing services provided by Defendant Angelone for the film project "Fear."		
5	<b>473.</b> Communications between Hidden Empire Film Group personnel and Google Workspace support produced in this action.		
6	<b>474.</b> Emails, documents, and communications relating to social-media account management work performed by Defendant Angelone for Hidden Empire Film Group or affiliated or		
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1	associated entities.		
2	<b>475.</b> Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Fear,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
3	<b>476.</b> Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Fatale,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
4	<b>477.</b> Emails, documents, and communications relating to the development, production, marketing, or distribution of the film project “Meet the Blacks,” including communications among		



1	Hidden Empire Film Group		
2	personnel and any		
3	third-party vendors or		
4	partners.		
5	<b>478.</b> Emails, documents, and		
6	communications relating to		
7	the development, production,		
8	marketing, or distribution of		
9	the film project “The		
10	Intruder,” including		
11	communications among		
12	Hidden Empire Film Group		
13	personnel and any		
14	third-party vendors or		
15	partners.		
16	<b>479.</b> Emails, documents, and		
17	communications relating to		
18	the development, production,		
19	marketing, or distribution of		
20	the film project “Traffik,”		
21	including communications		
22	among Hidden Empire Film		
23	Group personnel and any		
24	third-party vendors or		
25	partners.		
26	<b>480.</b> Emails, documents, and		
27	communications relating to		
28	the development, production,		



1	marketing, or distribution of 2 the film project “The 3 Intruder,” including 4 communications among 5 Hidden Empire Film Group 6 personnel and any 7 third-party vendors or 8 partners.		
9	<b>481.</b> Emails, documents, and 10 communications relating to 11 the development, production, 12 marketing, or distribution of 13 the film project 14 “Supremacy,” including 15 communications among 16 Hidden Empire Film Group 17 personnel and any 18 third-party vendors or 19 partners.		
20	<b>482.</b> Emails, documents, and 21 communications relating to 22 the development, production, 23 marketing, or distribution of 24 the project “Black History in 25 Two Minutes,” including 26 communications among 27 Hidden Empire Film Group 28 personnel and any		



1	third-party vendors or partners.		
2	483. Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Be Woke Vote,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
3	484. Emails, documents, and communications relating to the development, production, marketing, or distribution of the project “Climb Organization,” including communications among Hidden Empire Film Group personnel and any third-party vendors or partners.		
4	485. Emails, documents, and communications relating to the development, creation, marketing, or distribution of the “Fear Game” or “Fear		



1	NFT" project, including 2 communications among 3 Hidden Empire Film Group 4 personnel and any 5 third-party vendors or 6 partners.		
7	<b>486.</b> Text messages, including 8 audio message recordings, 9 exchanged between 10 Defendant Angelone and 11 Plaintiff Roxanne Taylor.		
12	<b>487.</b> Text messages, including 13 audio message recordings, 14 exchanged between 15 Defendant Angelone and 16 Plaintiff Deon Taylor.		
17	<b>488.</b> Communications, including 18 emails, text messages, and 19 messages on any platform, 20 between Defendant 21 Angelone and Hidden 22 Empire Film Group 23 representatives relating to 24 access, credentials, 25 permissions, or control of 26 any Hidden Empire Film 27 Group accounts.		
28	<b>489.</b> Communications, including		



1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28



1	Hidden Empire Film Group		
2	personnel and any		
3	third-party vendors or		
4	partners.		
5	<b>492.</b> Emails, documents, and		
6	communications relating to		
7	the development, production,		
8	marketing, or distribution of		
9	the project “The House Next		
10	Door: Meet the Blacks,”		
11	including communications		
12	among Hidden Empire Film		
13	Group personnel and any		
14	third-party vendors or		
15	partners.		
16	<b>493.</b> Emails, documents, and		
17	communications relating to		
18	the development, production,		
19	marketing, or distribution of		
20	the project “Free Agents,”		
21	including communications		
22	among Hidden Empire Film		
23	Group personnel and any		
24	third-party vendors or		
25	partners.		
26	<b>494.</b> Emails, documents, and		
27	communications relating to		
28	the development, production,		



1	marketing, or distribution of 2 the project “Hoop 2,” 3 including communications 4 among Hidden Empire Film 5 Group personnel and any 6 third-party vendors or 7 partners.		
8	<b>495.</b> Emails, documents, and 9 communications relating to 10 the development, production, 11 marketing, or distribution of 12 the project “Facts Not 13 Politics,” including 14 communications among 15 Hidden Empire Film Group 16 personnel and any 17 third-party vendors or 18 partners.		
20	<b>496.</b> Emails, documents, and 21 communications relating to 22 the development, production, 23 marketing, or distribution of 24 the project “Together We 25 Save Lives,” including 26 communications among 27 Hidden Empire Film Group 28 personnel and any third-party vendors or		



1	partners.		
2	497. Emails, documents, and 3 communications relating to 4 the development, production, 5 marketing, or distribution of 6 the project “Black Chair 7 Show,” including 8 communications among 9 Hidden Empire Film Group 10 personnel and any 11 third-party vendors or 12 partners.		
13	498. Emails, documents, and 14 communications relating to 15 the development, production, 16 marketing, or distribution of 17 the project “Black and 18 Blue,” including 19 communications among 20 Hidden Empire Film Group 21 personnel and any 22 third-party vendors or 23 partners.		
24	499. Emails, documents, and 25 communications relating to 26 Defendant Angelone’s 27 management, registration, 28 renewal, configuration, or		

	control of any domains owned or used by Hidden Empire Film Group LLC.		
<b>500.</b>	Documents, records, and social-media materials or data relating to the promotion of A One Entertainment LLC through Hidden Empire Film Group LLC or any associated entities' social-media accounts.		
<b>501.</b>	Communications, agreements, scope-of-work documents, and related materials concerning Plaintiff's retention of any third-party forensic consulting firm in connection with Defendant Angelone and the dissolution of the business relationship between the parties to this action.		
<b>502.</b>	Emails, text messages, and other communications between Quincy Newell and any party to this action,		

	including employees, representatives, or affiliates of Hidden Empire Film Group and any related or associated entities, and Defendant Angelone.		
<b>503.</b>	Written declarations, communications, and documents introduced in this action by Lawrence Hinkle.		
<b>504.</b>	Documents, communications, files, and materials relating to the creation, development, hosting, management, access, or operation of the website “lmaocomedyseries.com.”		
<b>505.</b>	Emails, documents, and communications among Darrick, A One Entertainment LLC, and any parties to this action relating to discussions concerning the formation of a digital-marketing company.		
<b>506.</b>	Emails, documents, and communications among		



1	Darrick, A One		
2	Entertainment LLC, and any		
3	parties to this action relating		
4	to Hyper Engine LLC.		
5	<b>507.</b> Emails, documents, and		
6	communications among		
7	Defendant Angelone, A One		
8	Entertainment LLC, and any		
9	parties to this action relating		
10	to terms, drafts, iterations of		
11	operating agreements, or		
12	negotiations among		
13	Defendant Angelone, A One		
14	Entertainment LLC, and		
15	parties to this action		
16	concerning Hyper Engine		
17	LLC.		
18	<b>508.</b> IRS documents or tax filings		
19	relating to Hyper Engine		
20	LLC.		
21	<b>509.</b> Emails, documents,		
22	agreements, and		
23	communications between		
24	Hidden Empire Film Group		
25	and its affiliated entities,		
26	Defendant Angelone, A One		
27	Entertainment LLC, and		
28	Optimad Media LLC relating		



1	to any services, collaborations, payments, marketing activities, or business dealings.		
5	<b>510.</b> Emails, messages, and other 6 communications between 7 Velma Sykes and any party 8 to this action, including 9 employees or affiliates of 10 Hidden Empire Film Group 11 LLC or its affiliates, 12 Defendant Angelone, and 13 any third-party individuals or 14 entities.		
15	<b>511.</b> Entity-formation records, 16 including articles of 17 organization, certificates, 18 amendments, applications, 19 state filings, correspondence 20 with any Secretary of State, 21 and related documents or 22 communications concerning 23 the formation, registration, 24 or organization of Hyper 25 Engine LLC.		
26	<b>512.</b> Presentation decks, drafts, 27 pitch materials, and 28 communications relating to		

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1	efforts to pitch Hyper Engine		
2	LLC services to		
3	entertainment companies,		
4	including Sony Pictures		
5	Entertainment, Lionsgate		
6	Films, and Warner Bros.		
7			
8	<b>513.</b> Documents, emails, text		
9	messages, drafts, pitch		
10	decks, research materials,		
11	and other communications		
12	evidencing or relating to the		
13	development of a		
14	COVID-19-related project		
15	involving the Coalition of		
16	National Black Churches.		
17			
18	<b>514.</b> Banking and financial		
19	records for Hyper Engine		
20	LLC, including account		
21	statements, transaction logs,		
22	reconciliations, canceled		
23	checks, check receipts, wire		
24	confirmations, deposit		
25	records, withdrawal records,		
26	and related financial		
27	documentation or		
28	communications with		
	banking personnel for		
	accounts opened under		



1	Hyper Engine LLC.		
2	<b>515.</b> Documents, notes, minutes, 3 and communications relating 4 to annual Hyper Engine 5 meetings, including meetings 6 held on May 21, 2018; 7 February 4, 2019; and 8 January 30, 2020, and 9 materials reflecting 10 discussions of Hyper 11 Engine's structure, its 12 relationship to Hidden 13 Empire Film Group, project 14 updates, and related action 15 items.		
16	<b>516.</b> Invoices, billing statements, 17 and related documents issued 18 by Defendant Angelone to 19 Plaintiffs or any third parties 20 reflecting or accounting for 21 work performed pursuant to, 22 or in connection with, Hyper 23 Engine LLC or entities 24 associated with Hidden 25 Empire Film Group.		
26	<b>517.</b> Contracts, agreements, 27 statements of work, and 28 related documents executed		



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	<p>by Defendant Angelone with any third-party individuals or entities that reflect, describe, or account for work performed pursuant to, or in connection with, Hyper Engine LLC.</p>		
<p><b>518.</b></p>	<p>Documents, emails, text messages, press releases, marketing materials, written statements, meeting notes, and other communications referring to or describing Defendant Angelone as a partner, member, executive, or principal of Hyper Engine LLC.</p>		
<p><b>519.</b></p>	<p>Documents, emails, and communications reflecting discussions among Defendant Angelone and any party to this action concerning Hyper Engine billing, staffing, proposals, project management, future operations, or other business affairs.</p>		
<p><b>520.</b></p>	<p>Emails, text messages, and</p>		



1	other communications 2 between Quincy Newell and 3 any party to this action, 4 including employees, 5 representatives, or affiliates 6 of Hidden Empire Film 7 Group and any related or 8 associated entities.		
9	<b>521.</b> Documents, drafts, files, 10 presentations, reports, and 11 other materials created, 12 authored, or generated by 13 Quincy Newell on behalf of 14 Hidden Empire Film Group 15 or any associated or related 16 entities.		
17	<b>522.</b> Emails, messages, and other 18 communications between 19 Damon Wolf and any party 20 to this action, including 21 employees or affiliates of 22 Hidden Empire Film Group 23 LLC or its affiliates, 24 Defendant Angelone, and 25 any third-party individuals or 26 entities.		
27	<b>523.</b> Emails, messages, and other 28 communications between		



1	2	3	4	5	6	7	8	9
		Omar Joseph and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.						
10	11	12	13	14	15	16	17	18
524.	524.	Emails, messages, and other communications between Andrew Bachelor and any party to this action, including employees or affiliates of Hidden Empire Film Group LLC or its affiliates, Defendant Angelone, and any third-party individuals or entities.						
19	20	21	22	23	24	25	26	27
525.	525.	Formation or registration documents filed by Defendant Angelone on behalf of Hidden Empire Film Group or any associated entities with the California Secretary of State.						
28	526.	526.	Emails, messages, and other communications between Robert Smith and any party					



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1	Darrick Angelone, AOne Holdings LLC, or On Chain Innovations, LLC.		
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4	<b>531.</b> Materials furnished by Aprio pursuant to any subpoena issued in this action.		
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7	<b>532.</b> Materials furnished by AT&T pursuant to any subpoena issued in this action.		
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11	<b>533.</b> Materials furnished by BCOUNTS4YOU pursuant to any subpoena issued in this action.		
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16	<b>534.</b> Materials furnished by Bank of the West pursuant to any subpoena issued in this action.		
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20	<b>535.</b> Materials furnished by BPM LLP pursuant to any subpoena issued in this action.		
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24	<b>536.</b> Materials furnished by Charter Communications pursuant to any subpoena issued in this action.		
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28	<b>537.</b> Materials furnished by City		

1	National Bank pursuant to any subpoena issued in this action.		
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4	<b>538.</b> Materials furnished by Frontier Communications pursuant to any subpoena issued in this action.		
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8	<b>539.</b> Materials furnished by Google pursuant to any subpoena issued in this action.		
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12	<b>540.</b> Materials furnished by McGee Media pursuant to any subpoena issued in this action.		
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17	<b>541.</b> Materials furnished by Meta pursuant to any subpoena issued in this action.		
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20	<b>542.</b> Materials furnished by Suzanne Summerville pursuant to any subpoena issued in this action.		
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24	<b>543.</b> Materials furnished by Quincy Newell pursuant to any subpoena issued in this action.		
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28	<b>544.</b> Materials furnished by		

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Los Angeles, CA 90067  
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1	Verizon pursuant to any 2 subpoena issued in this 3 action.		
4	<b>545.</b> Materials furnished by Work 5 Vineyard pursuant to any 6 subpoena issued in this 7 action.		
8	<b>546.</b> Emails, messages, and other 9 communications between 10 Barbara Campbell and any 11 party to this action, including 12 employees or affiliates of 13 Hidden Empire Film Group 14 LLC or its affiliates, 15 Defendant Angelone, and 16 any third-party individuals or 17 entities.		
18	<b>547.</b> Deposition transcripts of all 19 parties deposed by 20 Defendants in this action.		
21	<b>548.</b> Namecheap account records 22 and domain transfer logs for 23 Hidden-Empire-related 24 domains produced pursuant 25 to subpoena in this action.		
26	<b>549.</b> Any and all documents 27 relied upon by Defendants'		
28			

	expert Rick Watts in forming his opinions.		
<b>550.</b>	February 17, 2024 labor-law judgment entered against Roxanne Taylor in favor of Naomi Leslie in the amount of \$300,573.51; referenced in Roxanne Taylor deposition (9/10/2025).		
<b>551.</b>	Transcript excerpt pages 207–208 from Roxanne Taylor deposition (09/10/2025) discussing the Naomi Leslie labor judgment.		
<b>552.</b>	June 5, 2024 Statement of Information for MEET THE BLACKS LLC (Entity No. 201414810412) signed by Velma Sykes (SOI File No. BA20241089979).		
<b>553.</b>	June 5, 2024 Statement of Information for STRANDED LLC (Entity No. 201611210280) signed by Velma Sykes (SOI File No. BA20241090027).		



1	554.	June 5, 2024 Statement of Information for FREE AGENTS THE MOVIE LLC (Entity No. 202006010218) signed by Velma Sykes (SOI File No. BA20241090082).		
8	555.	June 5, 2024 Statement of Information for FATALE, LLC (Entity No. 201812210538) signed by Velma Sykes (SOI File No. BA20241090164).		
15	556.	June 5, 2024 Statement of Information for HYPER ENGINE, LLC (Entity No. 201807410500) signed by Velma Sykes (SOI File No. BA20241090301).		
21	557.	June 26, 2024 Statement of Information for AVVENT PRODUCTIONS LLC (Entity No. 201422410318) signed by Velma Sykes (SOI File No. BA20241205635).		
27	558.	July 10, 2024 Statement of Information for HIDDEN EMPIRE FILMS, LLC		

1	(Entity No. 202251711787) 2 signed by Erika Easter (SOI 3 File No. BA20241276613).		
4	<b>559.</b> August 12, 2024 Statement 5 of Information for HOOP 2 6 FILM LLC (Entity No. 7 201421610281) signed by 8 Velma Sykes (SOI File No. 9 BA20241456246).		
10	<b>560.</b> June 9, 2025 Statement of 11 Information for HIDDEN 12 EMPIRE HOLDINGS, LLC 13 (Entity No. 202117910005) 14 signed by Erika Easter (SOI 15 File No. BA20251252060).		

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Los Angeles, CA 90067  
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18 Dated: December 1, 2025

19 NEWELL LAW GROUP PC

20 By: /s/ Felton Newell  
21 FELTON T. NEWELL  
22 CHRISTINE SAID  
23 Attorneys for Plaintiffs and Counter-  
24 Claim Defendants HIDDEN EMPIRE  
25 HOLDINGS, LLC; HYPER ENGINE,  
26 LLC and DEON TAYLOR; and Third-  
27 Party Defendant ROXANNE TAYLOR

28 Dated: December 1, 2025

KRAMER, DEBOER & KEANE

By: /s/ Sandra Calin  
SANDRA CALIN  
Attorneys for Defendants DARRICK

1 ANGELONE, AONE CREATIVE,  
2 LLC and ON CHAIN INNOVATIONS,  
3 LLC

4 Dated: December 1, 2025

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LAW OFFICES OF JT FOX, APC

By: /s/ J.T. Fox

J.T. FOX  
JUSTIN KIAN

Attorneys for Defendants DARRICK  
ANGELONE, AONE CREATIVE,  
LLC and ON CHAIN INNOVATIONS,  
LLC

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